

Twin Harbors Waterkeeper (Eleanor Hines)



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To: Bobbak Talebi
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Submitted via online form: <https://admin.ecology.commentinput.com?id=6U54Erkfw>

February 4, 2026

Subject: SEPA Revised Draft Environmental Impact Statement for the Chehalis River Basin Flood Damage Reduction Project

Dear Bobbak Talebi:

Thank you for this opportunity to comment on the Draft Environmental Impacts Statement (DEIS) for the proposed Chehalis flood control dam. Twin Harbors Waterkeeper (THW) has many concerns about the environmental impacts, especially those that cannot be mitigated, of this project as outlined below. The mission of THW is to protect and improve water quality and marine and freshwater habitats on the Washington Coast including Westport and the watersheds of the Hoh, Quillayute, Queets and Quinault and Chehalis Rivers and the Chehalis River Estuary and Willapa Bay Watershed. Twin Harbors Waterkeeper works to address environmental health disparities that are driven by legacy and current pollution and systemic inequities that disadvantage communities of color and lower income populations on the Washington Coast. When we prioritize clean water, we are also prioritizing the health and well-being of our community, especially our youth and elders. We submit these comments on behalf of our members.

We incorporate by reference comments submitted by the Quinault Indian Nation, the Confederated Tribes of the Chehalis Reservation, Audubon Washington, Grays Harbor Audubon Society, Friends of Grays Harbor, Earth Ministry, Wild Salmon Center, Conservation Northwest, South Sound Sierra Club, Washington League of Women Voters, American White Water, Orca Network, Orca Conservancy, Pacific Rivers, Wild Fish Conservancy, Chehalis River Alliance, and the Wild Steelhead Coalition.

Ecology Must Conduct Statewide Public Hearings on the Draft Environmental Impact Statement on the Proposed Dam on the Chehalis River

The construction of a proposed dam on the Chehalis River is an issue that affects all residents of Washington State, because of the significant and detrimental impact to Salmon. Spring Chinook would become extinct and coho salmon nearly extinct by mid-century. Fall Chinook and Steelhead would see major reductions in their populations in both the mid-century and late-century periods.

The State's Fish and Wildlife Law RCW 77.04.012 states that "wildlife, fish, and shellfish are the property of the state." Who is the state? We are. According to Legislative findings and intent under RCW 77.04.020 "Washington's fish and wildlife resources are the responsibility of all residents of the state. We all benefit economically, recreationally and aesthetically from these resources."

Spring Chinook, coho salmon and steelhead are owned by all of us, no matter what river or where in the state these salmon survive.

Yet in-person public hearings have only been held in Southwest Washington. Although virtual meetings have been held, these meetings have not been well advertised throughout the State. No articles on the proposed dam and Draft EIS comment period have appeared only The Chronicle and Daily World. There has been nothing in the Seattle Times, Bellingham Herald, Spokane Review or Tacoma News Tribune.

The SEPA rules which guide the development of the Draft EIS have a section on the requirements for Commenting, WAC 197-11-500. The clear goal of these rules is to invite public and agency comments.

The WAC 197-11-502 Inviting Comment section of the SEPA rules states:

(6) (b) For nonproject proposals having a regional or statewide applicability, copies of the notice shall be given to the Olympia bureaus of the Associated Press and United Press International.

Although Ecology issued a press release on the DEIS, we have no idea if it was circulated statewide. Even if it was circulated the press release was not picked up statewide.

WAC 197-11-510 Public Notice states (1) When these rules require notice to be given under this section, the lead agency must use reasonable methods to inform the public and other agencies..." It can be argued that reasonable methods have not resulted in an informed public affected by the significant impacts reported in the DEIS.

Finally, WAC 197-11-535 Public Hearings states that public hearings can be requested:

"(b) When fifty or more persons residing within the jurisdiction of the lead agency, or who would be adversely affected by the environmental impact of the proposal, make written request to the lead agency within thirty days of issuance of the draft EIS; or

(c) When two or more agencies with jurisdiction over a proposal make written request to the lead agency within thirty days of the issuance of the draft EIS."

Since no one outside of Southwest Washington even knows about the proposed dam and its' proposed significant impacts on state resources and no one was made aware of their ability to request a public hearing, we request that statewide hearings be provided so that all residents of the state have the opportunity to comment on the proposed extinction of Spring Chinook salmon and near extinction of coho salmon on the Chehalis River. This is the clear intent of the SEPA implementing rules.

The SEPA is inadequate because it fails to take into account the impact of forest practices on flooding

“The EIS incorporates climate change projections for precipitation, temperature, flood peak flows, streamflow, and sea level rise throughout the analyses and modeling as part of the future conditions for all scenarios and for all resource areas.” (Page 1 Summary) It does not include the impact of forest practices in the headwaters of the Chehalis River.

How can you model peak climate change flooding without the knowledge of forest practices and potential wildfire impacts on flooding?

According to the Washington State Department of Ecology, “the December 2007 storm was a catastrophic event, particularly in parts of the upper Chehalis Basin and Stillman Creek watersheds that experienced up to 175% of the 100-year 24-hour rainfall. This event produced thousands of landslides on both recently harvested and older-timbered hillslopes, and delivered millions of cubic yards of sediment and debris to streams and rivers in the upper watershed. “The studies of the 2007 storm for the Chehalis Basin had some conflicting conclusions and are the subject of ongoing debate, making it difficult to reach a definitive conclusion on *how effective the current rules are during an extreme storm event.*” (Appendix A - Review of the Potential Effects of Forest Practices on Stream Flow in the Chehalis River Basin - Ecology 2016 <https://apps.ecology.wa.gov/publications/parts/1706017part27.pdf>).

Even though the effectiveness of Forest Practices Act rules are in question, the SEPA analysis is based on the assumption that these rules are effective in preventing landslides, debris flows, and flooding.

For example, Appendix 1 - Proposed Project Description and Alternatives mentions forest practices for the No Action Alternative. “Timber harvest would be expected to continue in the managed forest areas in the Chehalis Basin under current forest practice regulations and typical harvest cycles.” (page 80). The Proposed Action and Local Actions alternatives do not even mention forest practices.

In Appendix 2 - Cumulative Impact Analysis, only evaluates the impact of climate change scenarios and completely ignores the impact of forest practices. Appendix 2 states that “The purpose of the cumulative impacts analysis is to ensure that decision-makers consider the full range of consequences for the proposed action under expected future conditions...” (page 1).

Appendix 2 further states “although it is not clear how effective Forest Practices Rules are at reducing landslides and erosion during extreme storm events, such as the 2007 flood, it is clear that practices have improved the management of areas to reduce the potential for landslides during less severe floods (Ecology 2017).” (page 5) Appendix 2 also fails to address the impact of potential wildfires on flooding.

In spite of this lack of evidence that they are effective, the DEIS relies on the assumption that the Forest Practices Rules are working.

How has Ecology taken this uncertainty into account? If so, how?

Are the Forest Practices Act rules sufficient to prevent flooding?

Are the Forest Practices Act Rules sufficient to prevent cumulative impacts?

Appendix A (cited above) summarizes decades of literature focused on forest hydrology related to forest practices including road building, harvest and site prep on peak and low flows.

According to the authors, peak flows increase and low flows increase as the result of forest practices and road building in the Chehalis River Basin. Peak flows can take up to 20 years to return to pre-harvest flows and low flows can take up to 10-15 years to recover. Because these studies are based on small sites, there is no agreement on whether or not in large basins forest harvesting causes significant increases in peak flows or extreme flood events. For those reasons the authors “recommend studying the combined effects of forest practices and climate change in a modeling framework...” “Model implementation of the effectiveness of forest management practices on mitigating hydrologic impacts could be greatly improved if observational studies of the effects of these practices on streamflow were conducted first.”

A 2023 study from British Columbia has looked at large watersheds and separated out climate change impacts from forest practices. The first of its kind study in B.C. offers a glimpse into how logging impacts flooding at a large scale in forested watersheds. At Deadman River, the models showed logging only 21 per cent of the watershed led to a 38 per cent increase in mean flood levels; at Joe Ross Creek, the same amount of logging spiked flood levels by 84 per cent. But the biggest surprise, said to Younes Alila, a professor at the University of British Columbia’s department of forest resources management, was how frequent small, medium and big floods were expected to return when clear-cut logging occurs. In both rivers, seven-year and 20-year flood events became twice and four times more frequent. Fifty-year flood events were found to occur six times more often. And floods so rare they happened once in a 100 years increased in frequency 10-fold, meaning a flood of that size would return once every decade instead of once a century.

Wildfire can accelerate those effects (a major reason why Alila and Johnson ended their study in 2014 before fire ripped through the area). When a forest burns, it tends to create an impermeable ground layer of waxy residue, which acts like a slide for runoff to flow downhill and into rivers at a rate orders of magnitude larger than the effect of conventional logging, says Alila. Last year, a B.C. company that helps make sense of satellite data says it found a correlation between the 2021 wildfires and several bridges and sections of highway washed away during 2021's powerful floods.” (quoted from an article: “B.C. clear-cut logging makes 100 year flood 10 times more likely, study finds.” Vancouver is Awesome, Aug 2, 2023, Stefan Labbe’; The actual reference to the research is this: Robbie S.H. Johnson, Younes Alila, Nonstationary stochastic paired watershed approach: Investigating forest harvesting effects on floods in two large, nested, and snow-dominated watersheds in British Columbia, Canada, Journal of Hydrology, Volume 625, Part A, October 2023, 129970.) This research document is not referenced anywhere in the DEIS and the findings should added.

Finally, are we solving the wrong problem? Is it climate change or forest practices causing catastrophic flooding? How are we sure?

Additional concerns:

- During the flooding in December 2025, Concrete, WA did experience an earthquake on top of massive flooding and landslides. The EIS needs to consider the concurrence of an earthquake during flooding should be evaluated, including various scenarios of water behind the dam with landslides.
- During the flooding of December 2025, multiple atmospheric rivers impacted Washington State in succession. What happens if successive flooding events occur in the Chehalis watershed when there is an already full reservoir?
- The dam would significantly alter river processes important to maintain habitat for salmon and other species. How can the absence of ecosystem functions and services, such as lack of channelization for salmon habitat downstream, be mitigated? The downstream of the dam should include the entirety of the river system downstream of the dam, including the surge plain and tidal marsh and include marine impacts as well.
- Similarly, how can the upstream river be mitigated for salmon and other aquatic species?
- How will downstream shellfish beds and shellfish industry be impacted? The change in sediment loads is one example of a potential impact to shellfish. Similarly, impacts to Dungeness crabs (including impacts from temperature increases) should be analyzed.
- How would the certain demise or drastic decline of salmon runs impact the Chehalis River, tribes, recreational fisherman, commercial fisherman, recreationists, the nutrient cycle salmon play a role in when returning as adults to spawn, and the species, including orca down to invertebrates, that eat the salmon be impacted?
- What proven methods can be used to mitigate, rather than unproven proposed mitigation measures that are not analyzed for feasibility? How will mitigation be adaptively managed if mitigation does not go as proposed?
- The EIS should include and evaluate a range of alternatives, including the option to allow for natural ecosystems services and functions to continue to function as they are.
- The EIS needs to evaluate the full possibility of flooding scenarios, not just precipitation in the Willapa Hills areas of the basin.

We are thankful for this opportunity to provide comments, appreciate your time and consideration.

Respectfully,

Lee First, and Eleanor Hines

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